

In the Matter of \_\_\_\_\_ )  
 \_\_\_\_\_ )  
 Petition for a Notice of Inquiry Regarding 9-1-1 \_\_\_\_\_ ) PC Docket No. 08-51  
 Call-Forwarding Requirements and Carriers')  
 Blocking Options for Non-Initialized Phones

NSI phones do not have a valid phone number associated with them. That fact prevents anyone from calling that device including 9-1-1 public safety answering points (PSAP). Since NSI phones do not have a valid phone number identifying the “owner” of the phone is also not possible. Since we receive a number of 9-1-1 calls from NSI phones that either have no one on the line, or the caller hangs up, we have no way of re-establishing contact with this device in order to determine if a emergency exists or not.

While we have been aware that calls received from NSI phones cause our 9-1-1 call takers frustration, we were not sure of the extent of the problem. We decided to look at the month of January 2008 in order to quantify the problem. While this is just one month of the year we believe it to be fairly representative of our activity.

For the month of January 2008:

5,491--- 9-1-1 calls were received.

4,565---of the 9-1-1 calls were wireless (83%).

399 of these wireless 9-1-1 calls came from NSI phones. Of these:

14 or 3.5% were for actual incidents and a proper use of 9-1-1.

23 or 5.8% were classified as "open line" calls where no contact was made with the caller.

265 or 66.4 % were hang-up or abandoned calls, again with no contact made with the caller.

Another interesting fact was that 55% of the NSI calls came from phones that had made multiple 9-1-1 calls that month. A number of these we have classified as "prank" calls because of what the call taker can hear.

144 or 36% of the NSI 9-1-1 calls that month called 2-4 times.

76 or 19% of the NSI 9-1-1 calls that month called 5 times or more.

From the first four months of 2008 we have received over 200 9-1-1 hang-up calls from one NSI phone alone. Our PSAP's policy is to dispatch first responders to every 9-1-1 call even if there is no voice or if it is a hang-up call and no contact is made. This has increased the call taker's workload and frustrated the first responders because of a lack of a good location and incident type. We make the effort, but when these NSI phones are used to make prank calls it ties up resources that are needed to address the issues of valid calls for service.

#### **IV. CONCLUSION**

As a 9-1-1 Public Safety Answering Point we take responsibility for answering and processing calls for assistance from individuals who dial 9-1-1. We also realize that 9-1-1 calls from wireless devices will continue to increase as consumers rely on those devices more and more. We are extremely frustrated when we are unable to assist callers who use NSI phones because of the fact that we are unable to call these phones back should the connection be lost. We are also extremely frustrated by the number of prank 9-1-1 calls received from NSI phones that tie up the 9-1-1 trunks and our call takers.

We firmly believe the FCC has the authority and ability to change their current position on granting access to 9-1-1 for NSI phones. We believe that NSI phones should not have access to dial 9-1-1 and that the carriers need to block these phones from making calls.

We also believe the FCC has the opportunity to address this issue now that it is aware of the extent of the problem and how this issue impacts the PSAP ability to do its job.

Finally, we ask that you reverse your decision to allow NSI phones access to 9-1-1.

Respectfully Submitted,

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